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Reply Brief
EXAMINING GROUP 2835
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PATENT
Docket: 2207/4641

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

APPLICANT : Christopher B. FARMER
SERIAL NO. : 08/974,545
FILED : November 19, 1997
FOR : HORIZONTAL MOUNT FOR A PROCESSOR
GROUP ART UNIT : 2835
EXAMINER : Lisa Lea-Edmonds

ASSISTANT COMMISSIONER FOR PATENTS
Washington D.C. 20231

ATTENTION: Board of Patent Appeals and Interferences

APPELLANT'S REPLY BRIEF

SIR:

This reply brief is in response to the Examiner's Answer dated June 6, 2001.

Claims 16 reads as follows:

16. A method of mounting a cartridge processor having an edge connector on a motherboard comprising:

inserting the edge connector of said processor in a connector on said motherboard, said processor having an orientation parallel to and displaced from said motherboard.

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Claims 16 and 17 were rejected as anticipated by Sangveraphunsiri. The Examiner on page 9 of his Answer in responding to Appellant's arguments, contends that this reference in Figs. 21 and 22 shows "inserting the edge connector of the processor in a connector on the motherboard..." Appellant submits that the connector 566, shown here in Fig. 21, into which the edge connector is inserted is not "on the motherboard." It is in a bay and a further connection made from the bay to the motherboard 104. Thus, as more fully explained in Appellant' Brief, claim 16 and 17, which depends on claim 16, are not anticipated.

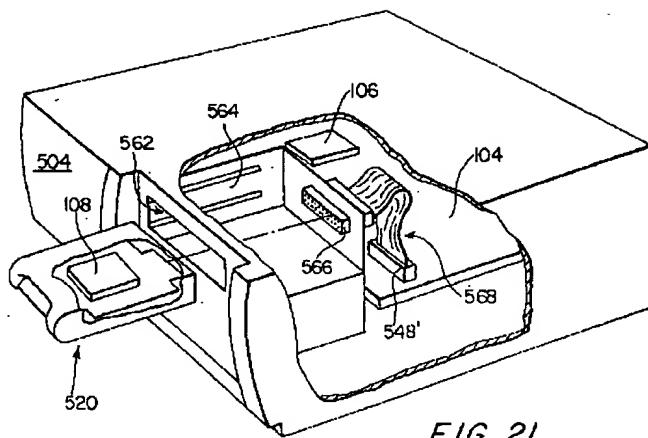


FIG. 21

Claim 1 reads as follows:

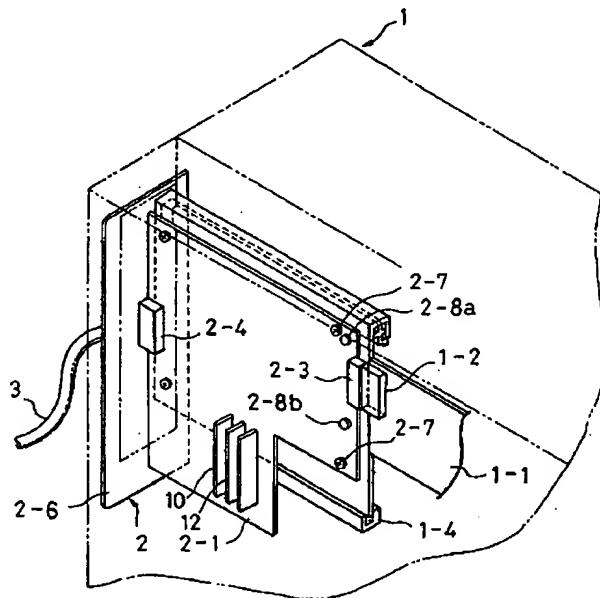
1. A mount to receive a cartridge processor having an edge connector, comprising: a motherboard connector to be mounted on a motherboard to receive said edge connector with said processor in an orientation parallel to and displaced from said motherboard.

This claim was rejected as obvious over Sangveraphunsiri in view of Hayakawa, et. al. In her Answer, the Examiner states she could have rejected this claim as anticipated. Again, however, Appellant submits that the reference does not teach a connector on a motherboard which can receive a processor with an edge connector in an orientation parallel to the mother board.

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In *Hayakawa et al.*, a controller board 2-1 plugs into a printer control board 1-1. The controller board, although it contains a CPU 10, is not, however, a processor cartridge or even a processor board and does not have a case as do the claimed processor cartridge and *Sangveraphunsiri*. It is a controller board that includes among other things a CPU. Furthermore, the structure shown and described does not have a case as do the claimed processor cartridge and *Sangveraphunsiri*. Board 1-1 does not have an edge connector. Rather a connector 2-3 mounted on the board 1-1 plugs into a connector 1-2 mounted on board 1-1.

FIG. 1



As noted in Appellant' Brief, even combining with *Sangveraphunsiri* one would not reach the claimed combination. One would simply have the arrangement of Figs 21 and 22 with guides. Again it is noted that the Examiner has not indicated why or how, despite the clear teaching of *Sangveraphunsiri*, one would modify that reference, to eliminate the bay, and plug the module into a connector directly on the motherboard.

The Examiner takes the position that Appellant has not distinguished from *Sangveraphunsiri* because he "has not limited the claims in such a way as to omit intermediate steps." It is apparently the Examiner's position that claim 16, for example, would encompass these additional steps. Appellant submits that this analysis does not hold up. Again, claim 16:

16. A method of mounting a cartridge processor having an edge connector on a motherboard comprising:

inserting the edge connector of said processor in a connector on said motherboard,
said processor having an orientation parallel to and displaced from said motherboard.

Appellant believes that the words “on a motherboard” are easily understood and do not mean on a bay which is then plugged into the motherboard. The steps in Sangveraphunsiri are inserting the edge connector of the processor in a connector in a bay; coupling one end of a ribbon connector to the bay connector; and plugging the other end of the ribbon connector into a connector on the motherboard.

Appellant submits that, properly interpreted, claim 16 does not read on those step. And after completion, Appellant submits that the cartridge processor is not on the motherboard, as set out in the preamble, but rather in the bay. Similar comments apply to the apparatus claims which require the connector to be on the motherboard.

The Examiner also contend that Appellant did not present separate arguments regarding the remaining claims. Appellants position is clear. At the bottom of page 8, it was noted that claims 4, 7, and 8 basically did rise or fall with claim 1. However, on page 9 specific arguments were made with respect to claims 5 and 9-11. Also, on that page, arguments concerning claims 6 and 7, and 12-15 and 18 are made, responding to the Examiner’s rejections.

Finally , the Examiner makes reference to the fact that Appellant discusses aspects of the references she did not relay upon. Obviousness must be evaluated by looking at the art a whole, not by taking bits and pieces and trying to assemble them into what an Applicant has claimed. Thus, Appellant believes that such consideration is necessary. The statement made in Appellant’s Brief brings this out and is repeated:

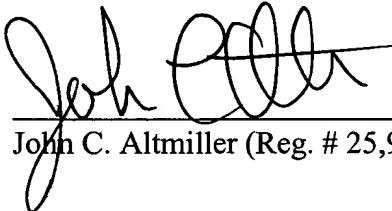
Appellant submits that if one is faced with mounting a processor module with an edge connector to a mother board, the art as a whole would suggest, if the module was to be plugged into an edge connector on the motherboard, plugging that board into the motherboard in a perpendicular orientation. Only two of the references, *Sangveraphunsiri* and *Feightner et al.* are directed to plugging of

processor modules. In both, when plugged into a connector on the motherboard, they are in a perpendicular arrangement. The other reference showing an edge connector, *Freer et al.* also plugs in perpendicularly. Thus, Appellant submits that there is no teaching or suggestion of doing other than what *Sangveraphunsiri* does, plugging into a connector on the board perpendicularly or utilizing a bay with a connector coupled by a cable to the motherboard. Neither of these arrangements meet the claimed limitations.

As noted above and in Appellant's Brief, the rejections against the claims do not hold up to careful analysis. Appellants therefore respectfully request that the Board of Patent Appeals and Interferences reverse the Examiner's decision rejecting claims 1-18 and direct the Examiner to pass the case to issue.

The Commissioner is hereby authorized to charge any fees which may be necessary for consideration of this paper to Kenyon & Kenyon Deposit Account No. 11-0600. A copy of this sheet is enclosed for that purpose.

Respectfully submitted,



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